

### **REMARKS**

This Application has been carefully reviewed in light of the Final Office Action mailed January 10, 2005. Applicants have amended Claims 1, 16, 30, and 34, and have added new Claim 41. Claims 1-8, 10-19, 21, 22, 24-30, and 32-41 are pending in the application. Applicants submit that the pending claims are patentably distinguishable over the cited references. Applicants, therefore, respectfully request reconsideration and favorable action in this case.

### **Section 102 Rejections**

The Office Action rejects Claims 30 and 32-33 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 5,684,800 issued to Dobbins et al. ("*Dobbins*"). Applicants respectfully traverse this rejection and all assertions therein for the reasons given below.

Independent Claim 30 recites, "a first port and a second port each including a receive-transmit pair (RTP), the RTP including a high-speed demultiplexer operable to process ingress traffic, a high-speed multiplexer operable to process egress traffic." *Dobbins*, in contrast, teaches receiving a broadcast or multicast packet at a first switch, encapsulating the packet, inserting a VLAN header, and flooding the VLAN packet out multicast channel 16 to all other switches. *See Dobbins*, column 6, lines 13-20. *Dobbins* does not disclose a high-speed multiplexer or demultiplexer. The Office Action states that because "the switch transmits several packets from an end station to various links... as well as transmits several packets received from different links to the end station... the switch must have structure that allows multiplexing/demultiplexing to be performed for each port connecting an end host." *Office Action*, page 2, item 1. Applicants respectfully submit that this statement is not true for packet-switched networks as multiplexers and demultiplexers are not inherent in packet-switched networks.

Furthermore, Claim 30 also recites, "wherein the first routing model comprises a first topology of the first port group independent of a second topology of the second port group of the second routing model." The Office Action acknowledges that *Dobbins* teaches a shared port between VLAN 100 and VLAN 20. *See Office Action*, page 3, item 3. Therefore, *Dobbins* does not disclose the first routing model including a first topology of the first port

group independent of a second topology of the second port group of the second routing model.

For at least these reasons, Applicants respectfully request reconsideration and allowance of Claim 30, as well as Claims 31-33, which depend from Claim 30.

### **Section 103 Rejections**

The Office Action rejects Claims 1-8, 10, 12-19, 21-22, 24-29, and 34-40 under 35 U.S.C. § 103(a) as being unpatentable over *Dobbins* in view of U.S. Patent Application Publication No. 2003/0165140 to Tang, et al. ("*Tang*"). Applicants respectfully traverse this rejection and all assertions therein for the reasons given below.

Claim 1 recites a transport element including a port group and an identifier operable to represent the port group as a single element to disparate elements and associated with a single IP address. For the teaching of this limitation, the Office Action asserts that the MVLAN is associated with one VLAN identifier that represents as an address for an entity outside the VLAN region acting as a disparate element. *See* Office Action, page 3, item 4. The Office Action also asserts that the VLAN identifier allows packets to be routed to a particular destination or destinations and meets the definition of address. *See* Office Action, page 2, item 2. Assuming, for arguments sake only, that the VLAN identifier meets the definition of an address, neither the MVLAN nor VLAN identifiers are associated with a single IP address as recited in Claim 1. For at least these reasons, Applicants respectfully submit that neither *Dobbins* nor *Tang*, alone or in combination, disclose, teach, or suggest each element of Claim 1 and request that the rejection of Claim 1 be withdrawn.

Claims 16 and 34 include limitations similar to those discussed above regarding Claim 1. Therefore, Claims 16 and 34 are believed to be patentably distinguishable from the cited references for at least the same reasons as Claim 1.

Claims 2-8, 10, and 12-15 depend from independent Claim 1. Claims 17-19, 21-22, and 24-29 depend from independent Claim 16. Claims 35-40 depend from independent Claim 34. Therefore, Applicants respectfully request the withdrawal of the rejections of

Claims 2-8, 10, 12-15, 17-19, 21-22, 24-29, and 35-40 for at least the same reasons as discussed above regarding Claims 1, 16, and 34.

Moreover, Claims 14 and 28 recite transmitting the internal packet directly on an optical link to an egress port in the port group. The Office action provides no support in *Dobbins* nor *Tang* for this limitation, and neither *Dobbins* nor *Tang*, alone or in combination, disclose, teach, or suggest an optical link. For at least these additional reasons, Applicants respectfully request the withdrawal of the rejections of Claims 14 and 28.

Further, the Office Action rejects Claim 11 under 35 U.S.C. § 103(a) as being unpatentable over *Dobbins* in view *Tang* as applied to Claim 10, and further in view of U.S. Patent No. 6,148,000 to Feldman et al. ("*Feldman*"). Applicants respectfully traverse this rejection and all assertions therein for the reasons given below.

Claim 11 depends from, and incorporates all the limitations of, independent Claim 1. As discussed above regarding Claim 1, the combination of *Dobbins* and *Tang* fails to disclose, teach, or suggest an identifier operable to represent the port group as a single element to disparate elements and associated with a single IP address. The cited portions of *Feldman* also fail to disclose, teach, or suggest these limitations. Therefore, Applicants respectfully request that the rejection of Claim 11 be withdrawn.

**CONCLUSION**

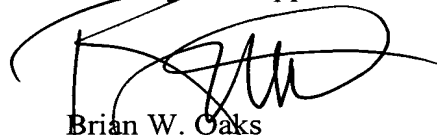
Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the present application is not allowed and/or if one or more of the rejections is maintained, Applicants hereby request a telephone conference with the Examiner and further request that the Examiner contact the undersigned attorney to schedule the telephone conference.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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